IN THE UNITED STATED BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

IN RE:	§	
MMA LAW FIRM, PLLC,	§	CASE NO: 24-31596
Debtor.	§ §	(Chapter 11)
MMA LAW FIRM, PLLC,	§	4
Plaintiff,	§ § 8	
VS.	§	Adv. Pro. No. 24-3127
MORRIS BART, LLC,	§ §	
Defendant.	§	

DEFENDANT'S NOTICE OF JURY DEMAND

TO THE HONORABLE EDUARDO V. RODRIGUEZ, CHIEF BANKRUPTCY JUDGE:

COMES NOW, Morris Bart, LLC (the "Defendant"), and makes this Defendant's Notice of Jury Demand as follows:

1. The Defendant requests a trial by jury on any and all issues triable by a jury. The claims, issues and matters alleged in the Plaintiff's complaint involve common law claims for money damages, which give rise to a trial by jury. The U.S. Supreme Court has held that such claims are entitled to a trial by jury. See Langenkamp v. Culp, 498 U.S. 42, 111 S.Ct. 2782 (1989). The Defendant does not consent to a trial by jury by the Bankruptcy Court.

DATED:

September 9, 2024

Respectfully submitted,

THE PROBUS LAW FIRM

By: /s/ Matthew B. Probus

Matthew B. Probus

Attorney in Charge

State Bar No. 16341200

Fed. I.D. No. 10915

matthewprobus@theprobuslawfirm.com

10497 Town & Country Way, Suite 930 Houston, Texas 77024 (713) 258-2700 (Telephone) (713) 258-2701 (Facsimile)

-and-

FISHMAN HAYGOOD, L.L.P.

Tristan Manthey
Tex. Bar No. 24042731
Cherie Dessaur Nobles, pro hac vice
Rebekka C. Veith, pro hac vice
201 St. Charles Avenue, Suite 4600
New Orleans, Louisiana 70170
(504) 586-5252 (Telephone)
(504) 586-2520 (Facsimile)
tmanthey@fishmanhaygood.com
cnobles@fishmanhaygood.com
rveith@fishmanhaygood.com

COUNSEL FOR DEFENDANT, MORRIS BART, LLC

CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2024, a true and correct copy of the foregoing has been served on all parties electronically via the CM/ECF filing system.

<u>/s/ Matthew B. Probus</u>
Matthew B. Probus